

## **REMARKS**

### 1. Present Status of Patent Application

This is a full and timely response to the outstanding non-final Office Action of July 30, 2009. Claims 1, 10, 19, and 24 have been amended and claims 1, 3, 5-11, 13-14, 16-19, 21-25, 27, and 29-32 remain pending in the present application. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

### 2. Response to Objection to the Specification

The Office Action objects to the specification as allegedly failing to provide antecedent basis for “a file transfer server having a processor,” as recited in claims 1 and 19. In response, Applicants point to FIG. 1B which shows a host computer having a processor 175. The host computer in FIG. 1B represents the host computer 105a and 105b of FIG. 1A. See lines 11-12 at page 8. Both host computers 105a, 105b show a connect:direct server 125a in FIG. 1A, also referred as a “Connect:Direct file transfer server 125a” on lines 8-11 at page 7 of Applicant’s disclosure. Accordingly, the host computer 105a acts as file transfer server as described in Applicant’s disclosure. As such, “a file transfer server having a processor” language in claims 1 and 19 is clearly supported by the present application. Withdrawal of the objection is respectfully requested.

3. Response to Rejections of Claims under 35 U.S.C. §103

Claims 1, 3, 5-11, 13-14, 16-19, 21-22, 24-25, 27, and 29-32 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over *Persels* (U.S. Patent No. 7,065,547) in view of *Hashem* (U.S. Patent No. 7,155,578).

a. Claim 1

As provided in independent claim 1, Applicant claims:

A file handling system, comprising:

a terminating file transfer server operable to receive a file transfer message from an originating file transfer server along with at least one file, the file transfer message including details about the transfer of said at least one file including a local user and at least one filename for said at least one file, ***the terminating file transfer server in response to receiving the file transfer message, executing an agent;***

***the agent operable to read the file transfer message received from the originating file transfer server, and direct the transfer of said at least one filename and said at least one file associated with said at least one filename to a home directory of the terminating file transfer server, the home directory associated with the local user in accordance with instructions from a configuration file residing in the home directory; and***

***the configuration file residing in the home directory, and operable to instruct the agent to, after saving the at least one file to the home directory, transfer said at least one file from the home directory to a remote host specified in the configuration file, wherein the configuration file comprises a host name and a port name of the remote host thereby allowing transfer of said at least one file to the remote host without necessitating the remote host being logged on the terminating file transfer server.***

(Emphasis added).

Applicant respectfully submits that independent claim 1 is allowable for at least the reason that *Persels* in view of *Hashem* does not disclose, teach, or suggest at least “the terminating file transfer server in response to receiving the file transfer message, executing an agent; the agent operable to read the file transfer message received from the originating file transfer server, and direct the transfer of said at least one filename and said at least one file associated with said at least one filename to a home directory of the terminating file transfer server, the home directory associated with the local user

in accordance with instructions from a configuration file residing in the home directory; and the configuration file residing in the home directory, and operable to instruct the agent to, after saving the at least one file to the home directory, transfer said at least one file from the home directory to a remote host specified in the configuration file, wherein the configuration file comprises a host name and a port name of the remote host thereby allowing transfer of said at least one file to the remote host without necessitating the remote host being logged on the terminating file transfer server,” as emphasized above.

In reviewing the reference, *Persels* describes that “the eFORWARD Server<sup>SM</sup> 12 will invoke an intermediate process specified below. Immediately upon receipt of the message by the eFORWARD server<sup>SM</sup> 12, the eFORWARD server<sup>SM</sup> 12 determines whether the partner eDIRECT<sup>TM</sup> is ‘checked in’ (i.e. listening). If so, contact with a listening eDIRECT client<sup>SM</sup> is attempted by sending a short message to the specified IP address and listening port. If a destination eDIRECT<sup>SM</sup> client responds, then the message is immediately delivered and so marked in the eFORWARD Server database 24. If the partner iBox<sup>SM</sup> eDIRECT client does not respond, then the message is retained in the eFORWARD database 24 until the partner iBox<sup>SM</sup> eDIRECT client contacts the eFORWARD Server 12 and requests delivery. An iBox eDIRECT Client is considered to be listening if it has sent the eFORWARD Server a message within the previous ‘n’ minutes advising it of the IP address and port number on which it is listening. The number of minutes, ‘n’, is an installation parameter.” Col. 6, lines 6-24 (Emphasis added).

Accordingly, *Persels* requires an eDIRECT client to establish a local presence of the client on eFORWARD Server to initiate delivery of a file. As such, *Persels* does not disclose that a configuration file residing in a home directory comprises a host name and port name of the remote host where a file is transferred. As a result, *Persels* fails to teach or suggest at least “the terminating file transfer server in response to receiving the file transfer message, executing an agent; the agent operable to read the file transfer message received from the originating file transfer server, and direct the transfer of said at least one filename and said at least one file associated with said at least one filename to a home directory of the terminating file transfer server, the home directory

associated with the local user in accordance with instructions from a configuration file residing in the home directory; and the configuration file residing in the home directory, and operable to instruct the agent to, after saving the at least one file to the home directory, transfer said at least one file from the home directory to a remote host specified in the configuration file, wherein the configuration file comprises a host name and a port name of the remote host thereby allowing transfer of said at least one file to the remote host without necessitating the remote host being logged on the terminating file transfer server,” as recited in claim 1.

The Office Action contends that *Hashem* remedies the deficiencies of *Persels* in disclosing the features of claim 1. *Hashem* describes techniques for transferring files from a first location to a second location. *Hashem* describes that a file may be placed in an outbasket at a first location and a process at the first location transfers the file to an inbasket at a second location. See Fig. 5.

For example, *Hashem* states that a “user will download files when a user needs to retrieve a file from another location, i.e., such as the remote entity 80. To perform such downloading, the user configures the system of the invention to indicate the locations where the files will be downloaded from. That is, the user configures the configuration parameters file 66 in the memory portion 60 to provide various associations between the various baskets. For example when uploading, a file that is placed in the internal outbasket 42 is transferred, based on the configuration information, to the external inbasket 87 in the remote entity FTP processing portion 82. In a similar manner when downloading or retrieving--a file that is placed in the external outbasket 85 in the remote entity FTP processing portion 82 may be configured for transfer to the internal inbasket 52, i.e., based on the configuration parameters that are stored in the configuration parameters file 66 in the FTP processing portion 10. That is, in accordance with one embodiment of the invention, the network interface portion 20 determines the source of a file upon receipt of a file. Based on the source, the network interface portion 20 places the file in an internal inbasket, i.e., based on the parameters in the configuration parameters file 66.” Cols. 8-9, lines 47-2 (Indentation removed). Therefore, an internal inbasket appears to be more akin to a home directory, using the language of claim 1, than to a remote host. It is noted that claim 1 requires a file to be

received at a terminating file transfer server, transferred and stored in a home directory by an agent, and then transferred from the home directory to a remote host as specified in a configuration file residing in the home directory. Hashem does not satisfy these requirements and does not remedy the deficiencies of Persels.

On this point, the Office Action asserts that “Hashem automatically download files to the destination user without requiring the destination user to login to the terminal file server.” Page 3. Applicant respectfully disagrees. Rather, *Hashem* discloses a home system 4 having a home FTP processing portion 10 and a remote entity 80 having a remote entity FTP processing portion 82. See FIG. 1. The home FTP processing portion 10 contains an internal outbasket 42 and internal inbasket 52. See FIG. 2. The remote entity FTP processing portion 82 contains an external outbasket 85 and external inbasket 87. See FIG. 4. Accordingly, to transfer a file from home system 4 to remote entity 80, the file is placed in the internal outbasket 42 of the home system 4 and then transferred to the external inbasket 87 of the remote entity 80. Likewise, to transfer a file from remote entity 80 to home system 4, the file is placed in the external outbasket 85 of the remote entity 80 and then transferred to the internal inbasket 52 of the home system 4. Hashem does not disclose the further act of transferring the file from either the internal inbasket 52 or external inbasket 87 in accordance with a configuration file residing in the respective inbasket.

As such, *Persels* in view of *Hashem* fails to teach or suggest at least “the terminating file transfer server in response to receiving the file transfer message, executing an agent; the agent operable to read the file transfer message received from the originating file transfer server, and direct the transfer of said at least one filename and said at least one file associated with said at least one filename to a home directory of the terminating file transfer server, the home directory associated with the local user in accordance with instructions from a configuration file residing in the home directory; and the configuration file residing in the home directory, and operable to instruct the agent to, after saving the at least one file to the home directory, transfer said at least one file from the home directory to a remote host specified in the configuration file, wherein the configuration file comprises a host name and a port name of the remote host thereby allowing transfer of said at least one file to the remote host without

necessitating the remote host being logged on the terminating file transfer server,” as recited in claim 1. (Emphasis added).

Accordingly, claim 1 is patentable over *Persels* in view of *Hashem*, and the rejection of claim 1 should be withdrawn.

b. Claims 3 and 5-9

For at least the reasons given above, claim 1 is allowable over the cited art of record. Since claims 3 and 5-9 depend from and include the features of claim 1 and recite additional features, claims 3 and 5-9 are allowable as a matter of law over the cited art of record.

c. Claim 10

As provided in independent claim 10, Applicant claims:

A method of handling files on a Connect:Direct server, comprising:  
receiving a file transfer message from an originating file transfer server at a terminating file transfer server;

***in response to receiving the file transfer message, executing an agent;***

***determining, by the agent, a home directory of the terminating file transfer server from a local user associated with the file transfer message;***

***storing at least one file associated with the file transfer message in the home directory;***

***retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote host; and***

***transmitting, via the agent, said at least one file responsive to the configuration file to the remote host without necessitating the remote host being logged on the terminating file transfer server.***

(Emphasis added).

Applicant respectfully submits that independent claim 10 is allowable for at least the reason that *Persels* in view of *Hashem* does not disclose, teach, or suggest at least “in response to receiving the file transfer message, executing an agent; determining, by the agent, a home directory of the terminating file transfer server from a local user associated with the file transfer message; storing at least one file associated with the file

transfer message in the home directory; retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote host; and transmitting, via the agent, said at least one file responsive to the configuration file to the remote host without necessitating the remote host being logged on the terminating file transfer server,” as emphasized above.

In reviewing the reference, *Perse/s* describes that “the eFORWARD Server<sup>SM</sup> 12 will invoke an intermediate process specified below. Immediately upon receipt of the message by the eFORWARD server<sup>SM</sup> 12, the eFORWARD server<sup>SM</sup> 12 determines whether the partner eDIRECT<sup>TM</sup> is ‘checked in’ (i.e. listening). If so, contact with a listening eDIRECT client<sup>SM</sup> is attempted by sending a short message to the specified IP address and listening port. If a destination eDIRECT<sup>SM</sup> client responds, then the message is immediately delivered and so marked in the eFORWARD Server database 24. If the partner iBox<sup>SM</sup> eDIRECT client does not respond, then the message is retained in the eFORWARD database 24 until the partner iBox<sup>SM</sup> eDIRECT client contacts the eFORWARD Server 12 and requests delivery. An iBox eDIRECT Client is considered to be listening if it has sent the eFORWARD Server a message within the previous ‘n’ minutes advising it of the IP address and port number on which it is listening. The number of minutes, ‘n’, is an installation parameter.” Col. 6, lines 6-24.

Accordingly, *Perse/s* requires an eDIRECT client to establish a local presence of the client on eFORWARD Server to initiate delivery of a file. As such, *Perse/s* does not disclose that a configuration file residing in a home directory comprises a host name and port name of the remote host where a file is transferred. As a result, *Perse/s* fails to teach or suggest at least “in response to receiving the file transfer message, executing an agent; determining, by the agent, a home directory of the terminating file transfer server from a local user associated with the file transfer message; storing at least one file associated with the file transfer message in the home directory; retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote host; and transmitting, via the agent, said at least one file responsive to the configuration file to the remote host without necessitating the remote host being logged on the terminating file transfer server,” as recited in claim 10.

The Office Action contends that *Hashem* remedies the deficiencies of *Persels* in disclosing the features of claim 10. *Hashem* describes techniques for transferring files from a first location to a second location. *Hashem* describes that a file may be placed in an outbasket at a first location and a process at the first location transfers the file to an inbasket at a second location. See Fig. 5.

For example, *Hashem* states that a “user will download files when a user needs to retrieve a file from another location, i.e., such as the remote entity 80. To perform such downloading, the user configures the system of the invention to indicate the locations where the files will be downloaded from. That is, the user configures the configuration parameters file 66 in the memory portion 60 to provide various associations between the various baskets. For example when uploading, a file that is placed in the internal outbasket 42 is transferred, based on the configuration information, to the external inbasket 87 in the remote entity FTP processing portion 82. In a similar manner when downloading or retrieving--a file that is placed in the external outbasket 85 in the remote entity FTP processing portion 82 may be configured for transfer to the internal inbasket 52, i.e., based on the configuration parameters that are stored in the configuration parameters file 66 in the FTP processing portion 10. That is, in accordance with one embodiment of the invention, the network interface portion 20 determines the source of a file upon receipt of a file. Based on the source, the network interface portion 20 places the file in an internal inbasket, i.e., based on the parameters in the configuration parameters file 66.” Cols. 8-9, lines 47-2 (Indentation removed). Therefore, an internal inbasket appears to be more akin to a home directory, using the language of claim 10, than to a remote host. It is noted that claim 10 requires a file to be received at a terminating file transfer server, transferred and stored in a home directory by an agent, and then transferred from the home directory to a remote host as specified in a configuration file residing in the home directory. *Hashem* does not satisfy these requirements and does not remedy the deficiencies of *Persels*.

On this point, the Office Action asserts that “Hashem automatically download files to the destination user without requiring the destination user to login to the terminal file server.” Page 3. Applicant respectfully disagrees. Rather, *Hashem* discloses a home system 4 having a home FTP processing portion 10 and a remote entity 80



having a remote entity FTP processing portion 82. See FIG. 1. The home FTP processing portion 10 contains an internal outbasket 42 and internal inbasket 52. See FIG. 2. The remote entity FTP processing portion 82 contains an external outbasket 85 and external inbasket 87. See FIG. 4. Accordingly, to transfer a file from home system 4 to remote entity 80, the file is placed in the internal outbasket 42 of the home system 4 and then transferred to the external inbasket 87 of the remote entity 80. Likewise, to transfer a file from remote entity 80 to home system 4, the file is placed in the external outbasket 85 of the remote entity 80 and then transferred to the internal inbasket 52 of the home system 4. *Hashem* does not disclose the further act of transferring the file from either the internal inbasket 52 or external inbasket 87 in accordance with a configuration file residing in the respective inbasket.

As such, *Persels* in view of *Hashem* fails to teach or suggest at least “in response to receiving the file transfer message, executing an agent; determining, by the agent, a home directory of the terminating file transfer server from a local user associated with the file transfer message; storing at least one file associated with the file transfer message in the home directory; retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote host; and transmitting, via the agent, said at least one file responsive to the configuration file to the remote host without necessitating the remote host being logged on the terminating file transfer server,” as recited in claim 10.

Accordingly, claim 10 is patentable over *Persels* in view of *Hashem*, and the rejection of claim 10 should be withdrawn.

d. Claims 11, 13-14, and 16-18

For at least the reasons given above, claim 10 is allowable over the cited art of record. Since claims 11, 13-14, and 16-18 depend from and include the features of claim 10 and recite additional features, claims 11, 13-14, and 16-18 are allowable as a matter of law over the cited art of record.

e. Claim 19

As provided in independent claim 19, Applicant claims:

A Connect:Direct file handling system, comprising:  
a terminating file transfer server;  
an agent; and  
a configuration file;

***the terminating file transfer server launching the agent upon receipt of a file transfer message, the file transfer message comprising a local username and at least one filename, and the agent directing the transfer of and storage of at least one file associated with the filename to a home directory of the terminating file transfer server associated with the username, the agent reading the configuration file, and transferring said at least one file from the home directory to a remote host specified by the configuration file without necessitating the remote host being logged on the terminating file server, wherein the configuration file is operable to store a host name and a port number associated with the remote host.***

(Emphasis added).

Applicant respectfully submits that independent claim 19 is allowable for at least the reason that *Persels* in view of *Hashem* does not disclose, teach, or suggest at least “the terminating file transfer server launching the agent upon receipt of a file transfer message, the file transfer message comprising a local username and at least one filename, and the agent directing the transfer of and storage of at least one file associated with the filename to a home directory of the terminating file transfer server associated with the username, the agent reading the configuration file, and transferring said at least one file from the home directory to a remote host specified by the configuration file without necessitating the remote host being logged on the terminating file server, wherein the configuration file is operable to store a host name and a port number associated with the remote host,” as emphasized above.

In reviewing the reference, *Persels* describes that “the eFORWARD Server<sup>SM</sup> 12 will invoke an intermediate process specified below. Immediately upon receipt of the message by the eFORWARD server<sup>SM</sup> 12, the eFORWARD server<sup>SM</sup> 12 determines whether the partner eDIRECT<sup>TM</sup> is ‘checked in’ (i.e. listening). If so, contact with a listening eDIRECT client<sup>SM</sup> is attempted by sending a short message to the specified IP address and listening port. If a destination eDIRECT<sup>SM</sup> client responds, then the

message is immediately delivered and so marked in the eFORWARD Server database 24. If the partner iBox<sup>SM</sup> eDIRECT client does not respond, then the message is retained in the eFORWARD database 24 until the partner iBox<sup>SM</sup> eDIRECT client contacts the eFORWARD Server 12 and requests delivery. An iBox eDIRECT Client is considered to be listening if it has sent the eFORWARD Server a message within the previous 'n' minutes advising it of the IP address and port number on which it is listening. The number of minutes, 'n', is an installation parameter.” Col. 6, lines 6-24.

Accordingly, *Persels* requires an eDIRECT client to establish a local presence of the client on eFORWARD Server to initiate delivery of a file. As such, *Persels* does not disclose that a configuration file residing in a home directory comprises a host name and port name of the remote host where a file is transferred. As a result, *Persels* fails to teach or suggest at least “the terminating file transfer server launching the agent upon receipt of a file transfer message, the file transfer message comprising a local username and at least one filename, and the agent directing the transfer of and storage of at least one file associated with the filename to a home directory of the terminating file transfer server associated with the username, the agent reading the configuration file, and transferring said at least one file from the home directory to a remote host specified by the configuration file without necessitating the remote host being logged on the terminating file server, wherein the configuration file is operable to store a host name and a port number associated with the remote host,” as recited in claim 19.

The Office Action contends that *Hashem* remedies the deficiencies of *Persels* in disclosing the features of claim 19. *Hashem* describes techniques for transferring files from a first location to a second location. *Hashem* describes that a file may be placed in an outbasket at a first location and a process at the first location transfers the file to an inbasket at a second location. See Fig. 5.

For example, *Hashem* states that a “user will download files when a user needs to retrieve a file from another location, i.e., such as the remote entity 80. To perform such downloading, the user configures the system of the invention to indicate the locations where the files will be downloaded from. That is, the user configures the configuration parameters file 66 in the memory portion 60 to provide various associations between the various baskets. For example when uploading, a file that is

placed in the internal outbasket 42 is transferred, based on the configuration information, to the external inbasket 87 in the remote entity FTP processing portion 82. In a similar manner when downloading or retrieving--a file that is placed in the external outbasket 85 in the remote entity FTP processing portion 82 may be configured for transfer to the internal inbasket 52, i.e., based on the configuration parameters that are stored in the configuration parameters file 66 in the FTP processing portion 10. That is, in accordance with one embodiment of the invention, the network interface portion 20 determines the source of a file upon receipt of a file. Based on the source, the network interface portion 20 places the file in an internal inbasket, i.e., based on the parameters in the configuration parameters file 66.” Cols. 8-9, lines 47-2 (Indentation removed). Therefore, an internal inbasket appears to be more akin to a home directory, using the language of claim 19, than to a remote host. It is noted that claim 19 requires a file to be received at a terminating file server, transferred and stored in a home directory by an agent, and then transferred from the home directory to a remote host as specified in a configuration file residing in the home directory. *Hashem* does not satisfy these requirements and does not remedy the deficiencies of *Persels*.

On this point, the Office Action asserts that “Hashem automatically download files to the destination user without requiring the destination user to login to the terminal file server.” Page 3. Applicant respectfully disagrees. Rather, *Hashem* discloses a home system 4 having a home FTP processing portion 10 and a remote entity 80 having a remote entity FTP processing portion 82. See FIG. 1. The home FTP processing portion 10 contains an internal outbasket 42 and internal inbasket 52. See FIG. 2. The remote entity FTP processing portion 82 contains an external outbasket 85 and external inbasket 87. See FIG. 4. Accordingly, to transfer a file from home system 4 to remote entity 80, the file is placed in the internal outbasket 42 of the home system 4 and then transferred to the external inbasket 87 of the remote entity 80. Likewise, to transfer a file from remote entity 80 to home system 4, the file is placed in the external outbasket 85 of the remote entity 80 and then transferred to the internal inbasket 52 of the home system 4. *Hashem* does not disclose the further act of transferring the file from either the internal inbasket 52 or external inbasket 87 in accordance with a configuration file residing in the respective inbasket.

As such, *Persels* in view of *Hashem* fails to teach or suggest at least “the terminating file transfer server launching the agent upon receipt of a file transfer message, the file transfer message comprising a local username and at least one filename, and the agent directing the transfer of and storage of at least one file associated with the filename to a home directory of the terminating file transfer server associated with the username, the agent reading the configuration file, and transferring said at least one file from the home directory to a remote host specified by the configuration file without necessitating the remote host being logged on the terminating file server, wherein the configuration file is operable to store a host name and a port number associated with the remote host,” as recited in claim 19.

Accordingly, claim 19 is patentable over *Persels* in view of *Hashem*, and the rejection of claim 19 should be withdrawn.

f. Claims 21-23

For at least the reasons given above, claim 19 is allowable over the cited art of record. Since claims 21-23 depend from and include the features of claim 19 and recite additional features, claims 21-23 are allowable as a matter of law over the cited art of record.

Further, with regard to claim 23, the Office Action states the “renaming of downloaded files were well-known in the networking art, as evidenced by Campbell US Publication 2005/0086298, Paragraph 254-257, Paragraph 272.” Page 4. Applicant respectfully traverses the finding and respectfully submits that it has not been established that a “the file processor being operable to receive files via the port monitor, and assign said at least one filename to said at least one file received, respectively,” as described in claim 23, is capable of instant and unquestionable demonstration as being well-known.

g. Claim 24

As provided in independent claim 24, Applicant claims:

A computer diskette having a program for handling files on a Connect:Direct server, wherein the computer diskette is a physical structure executed by a computer and the program is operable to perform:

receiving a file transfer message from an originating file transfer server at a terminating file transfer server;

***in response to receiving the file transfer message, executing an agent;***

***determining, by the agent, a home directory of the terminating file transfer server from a local user associated with the file transfer message;***

***storing at least one file associated with the file transfer message in the home directory;***

***retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote host; and***

***transmitting, via the agent, said at least one file responsive to the configuration file to the remote host without necessitating the remote host being logged on the terminating file transfer server.***

(Emphasis added).

Applicant respectfully submits that independent claim 24 is allowable for at least the reason that *Persels* in view of *Hashem* does not disclose, teach, or suggest at least “in response to receiving the file transfer message, executing an agent; determining, by the agent, a home directory of the terminating file transfer server from a local user associated with the file transfer message; storing at least one file associated with the file transfer message in the home directory; retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote host; and transmitting, via the agent, said at least one file responsive to the configuration file to the remote host without necessitating the remote host being logged on the terminating file transfer server,” as emphasized above.

In reviewing the reference, *Persels* describes that “the eFORWARD Server<sup>SM</sup> 12 will invoke an intermediate process specified below. Immediately upon receipt of the message by the eFORWARD server<sup>SM</sup> 12, the eFORWARD server<sup>SM</sup> 12 determines whether the partner eDIRECT<sup>TM</sup> is ‘checked in’ (i.e. listening). If so, contact with a listening eDIRECT client<sup>SM</sup> is attempted by sending a short message to the specified IP

address and listening port. If a destination eDIRECT<sup>SM</sup> client responds, then the message is immediately delivered and so marked in the eFORWARD Server database 24. If the partner iBox<sup>SM</sup> eDIRECT client does not respond, then the message is retained in the eFORWARD database 24 until the partner iBox<sup>SM</sup> eDIRECT client contacts the eFORWARD Server 12 and requests delivery. An iBox eDIRECT Client is considered to be listening if it has sent the eFORWARD Server a message within the previous 'n' minutes advising it of the IP address and port number on which it is listening. The number of minutes, 'n', is an installation parameter." Col. 6, lines 6-24.

Accordingly, *Persels* requires an eDIRECT client to establish a local presence of the client on eFORWARD Server to initiate delivery of a file. As such, *Persels* does not disclose that a configuration file residing in a home directory comprises a host name and port name of the remote host where a file is transferred. As a result, *Persels* fails to teach or suggest at least "in response to receiving the file transfer message, executing an agent; determining, by the agent, a home directory of the terminating file transfer server from a local user associated with the file transfer message; storing at least one file associated with the file transfer message in the home directory; retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote host; and transmitting, via the agent, said at least one file responsive to the configuration file to the remote host without necessitating the remote host being logged on the terminating file transfer server," as recited in claim 24.

The Office Action contends that *Hashem* remedies the deficiencies of *Persels* in disclosing the features of claim 24. *Hashem* describes techniques for transferring files from a first location to a second location. *Hashem* describes that a file may be placed in an outbasket at a first location and a process at the first location transfers the file to an inbasket at a second location. See Fig. 5.

For example, *Hashem* states that a "user will download files when a user needs to retrieve a file from another location, i.e., such as the remote entity 80. To perform such downloading, the user configures the system of the invention to indicate the locations where the files will be downloaded from. That is, the user configures the configuration parameters file 66 in the memory portion 60 to provide various

associations between the various baskets. For example when uploading, a file that is placed in the internal outbasket 42 is transferred, based on the configuration information, to the external inbasket 87 in the remote entity FTP processing portion 82. In a similar manner when downloading or retrieving--a file that is placed in the external outbasket 85 in the remote entity FTP processing portion 82 may be configured for transfer to the internal inbasket 52, i.e., based on the configuration parameters that are stored in the configuration parameters file 66 in the FTP processing portion 10. That is, in accordance with one embodiment of the invention, the network interface portion 20 determines the source of a file upon receipt of a file. Based on the source, the network interface portion 20 places the file in an internal inbasket, i.e., based on the parameters in the configuration parameters file 66.” Cols. 8-9, lines 47-2 (Indentation removed). Therefore, an internal inbasket appears to be more akin to a home directory, using the language of claim 24, than to a remote host. It is noted that claim 24 requires a file to be received at a terminating file transfer server, transferred and stored in a home directory by an agent, and then transferred from the home directory to a remote host as specified in a configuration file residing in the home directory. *Hashem* does not satisfy these requirements and does not remedy the deficiencies of *Persels*.

On this point, the Office Action asserts that “Hashem automatically download files to the destination user without requiring the destination user to login to the terminal file server.” Page 3. Applicant respectfully disagrees. Rather, *Hashem* discloses a home system 4 having a home FTP processing portion 10 and a remote entity 80 having a remote entity FTP processing portion 82. See FIG. 1. The home FTP processing portion 10 contains an internal outbasket 42 and internal inbasket 52. See FIG. 2. The remote entity FTP processing portion 82 contains an external outbasket 85 and external inbasket 87. See FIG. 4. Accordingly, to transfer a file from home system 4 to remote entity 80, the file is placed in the internal outbasket 42 of the home system 4 and then transferred to the external inbasket 87 of the remote entity 80. Likewise, to transfer a file from remote entity 80 to home system 4, the file is placed in the external outbasket 85 of the remote entity 80 and then transferred to the internal inbasket 52 of the home system 4. *Hashem* does not disclose the further act of transferring the file



from either the internal inbasket 52 or external inbasket 87 in accordance with a configuration file residing in the respective inbasket.

As such, *Persels* in view of *Hashem* fails to teach or suggest at least “in response to receiving the file transfer message, executing an agent; determining, by the agent, a home directory of the terminating file transfer server from a local user associated with the file transfer message; storing at least one file associated with the file transfer message in the home directory; retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote host; and transmitting, via the agent, said at least one file responsive to the configuration file to the remote host without necessitating the remote host being logged on the terminating file transfer server,” as recited in claim 24.

Accordingly, claim 24 is patentable over *Persels* in view of *Hashem*, and the rejection of claim 24 should be withdrawn.

h. Claims 25, 27, and 29-32

For at least the reasons given above, claim 24 is allowable over the cited art of record. Since claims 25, 27, and 29-32 depend from and include the features of claim 24 and recite additional features, claims 25, 27, and 29-32 are allowable as a matter of law over the cited art of record.

### **CONCLUSION**

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and official notice, or statements interpreted similarly, should not be considered well-known for at least the specific and particular reason that the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions.

For at least the reasons set forth above, Applicant respectfully submits that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. In addition, Applicant reserves the right to address any comments made in the Office Action that were not specifically addressed herein. Thus, such comments should not be deemed admitted by the Applicant. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

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